

Exhibit C

JP Perry

From: Weiss, Dara (Law) <daweiss@law.nyc.gov>
Sent: Friday, September 17, 2021 9:24 AM
To: Sow-Legal; sierrateam@moskovitzlaw.com; Payne Litigation Team; AG-NYPLitigation; wood@klflaw.com; Andrew Stoll
Cc: Kaufman, Rachel (LAW); DiSenso, Anthony (Law); Breslow, Stephanie (Law); Jacobs, Elissa (Law)
Subject: Today's meet and confer

Counselors:

After discussion with my team and my clients, we believe it would be best to postpone the bulk today's 9:30am meet-and-confer to a time where it can be more productive. I apologize for the last-minute nature of this email, but as you are aware, I was out of the office and unavailable since Wednesday afternoon as I was observing Yom Kippur.

At the outset, a representative of the NYPD will not be participating in any meet and confer, but instead has provided my team with information addressing your concerns set forth in Travis's September 10th email. I have not yet had the opportunity to go through that information, and am not yet ready to discuss it with you, so cannot yet meet and confer on it. We can reschedule that portion of the meet and confer for early next week.

With respect to the continuation of the 30(b)(6) part of the discussion, I understand members of my team had requested plaintiffs provide their position or suggest areas where they were willing to compromise and/or narrow their requests, but also because of the holiday, counsel needed additional time to do so. Therefore I'm not sure where we can go with that part of the meet and confer. We are happy to participate on areas you think we can compromise on, but to the extent you are not prepared to compromise/narrow, I'm not sure a further meet and confer will be fruitful.

Finally, with respect to Defendants' responses to second set of document requests and responses to Sierra's demands, I had a phone conversation with Mike Spiegel on, I believe it was Tuesday, wherein I told him I was personally working on the consolidated demands and would have them completed today. The Sierra demands will be completed on Monday.

The helmet index, the Aviation video, the responses to Interrogatories 2-6, 11, and the scope of the privilege log are issues that Elissa Jacobs is familiar with, and she is not available today and cannot be on the call, so those issues cannot be discussed.

We will call in at 9:30, but for the limited purpose of trying to compromise on the 30(b)(6) issues, if counsel for plaintiffs are ready to narrow and/or compromise on their notices.

Thank you.

Best,
Dara

bbbbbbbbbbbbbbbbbbbbbbbbbbbbbb#
 Gdud#01#Z hlvv#
 Vhqiru#Frxqvhd#
 Qhz #\run#Fw| #Qdz #Ghsdum hqw#
 Vshfldq#Ihghudq#Qwjdwrq#
 433#Fkxufk#Vwihw#
 Qhz #\run#Qhz #\run#4333:#
 +545,6890684:#
 gdz hlvvC dz lq| fljry#